

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PRINCESS CEDENO,
Plaintiff,

v.

CAVARY PROTFOLIO SERVICES,
PORTFOLIO RECOVER ASSOCIATES,
NCO FINANCIAL SYSTEMS,
I C SYSTEMS, INC., PROTOCOL
RECOVERY SERVICES, STELLA
RECOVERY INC., AMERICAN PROFIT
RECOVERY, ALLIED COLLECTION
SERVICES, PRINCIPE & STRASNICK, PC,
RJM ACQUISITIONS and TATA KIRLIN

Defendant.

CIVIL ACTION NO. 13-cv-12510-JGD

**DEFENDANTS, NCO FINANCIAL SYSTEMS INC. AND TATE & KIRLIN
ASSOCIATES, INC. MOTION FOR JUDGMENT ON THE PLEADINGS**

Pursuant to Fed. R. civ. P. 12(c), the Defendants NCO Financial Systems, Inc. (NCO) and Tate & Kirlin Associates, Inc. (TKA) move for judgment on the pleadings as the plaintiff has failed to state a claim upon which relief can be granted. In support of this Motion, and in accordance with basic principles of economy and efficiency and Fed. R. Civ. P. 10(c), NCO and TKA incorporate here all points and authorities presented by Protocol Recovery Services, Inc. (Protocol) in support of its Motion to Dismiss Complaint (Docket No. 39) and Memorandum in support of its Motion (Docket No. 40). For all the reasons provided by Protocol in its Motion, the plaintiff has failed to state any claim against NCO or TKA, and judgment should enter in their favor pursuant to Rule 12(c).

For these reasons, the Defendants NCO and TKA request that the Court grant this motion and enter judgment in their favor dismissing all of plaintiff's claims against them.

Respectfully submitted,

NCO Financial Systems, Inc.
Tate & Kirlin Associates, Inc.
By its attorney,

/s/ Jennifer L. Markowski
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CERTIFICATE OF SERVICE

I certify that on November 26, 2013, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system.

Additionally, a copy of the foregoing has been delivered via U.S. Mail to the following:

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Pro Se Plaintiff

/s/ Jennifer Markowski
Jennifer Markowski